

BAILEY DUQUETTE P.C.

September 16, 2013

Via ECF

The Honorable James Orenstein
United States Magistrate Judge for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201
Chambers: Room 1227 South
Courtroom: 11D South

Re: *Drummond Company Inc. v. Collingsworth, et al.*, Case No. 1:13-mc-690-JBW-JO

Dear Judge Orenstein:

Pursuant to Section III.C.1.b. of your Individual Practice Rules, the parties have agreed to the following amended briefing schedule for the Motion for Protective Order and/or an Order to Quash filed by Defendants in the above-referenced matter:

Plaintiff's memorandum of law in opposition:

October 17, 2013

Defendants' reply memorandum of law:

October 31, 2013

This is a miscellaneous proceeding regarding a subpoena issued in connection with *Drummond Company, Inc. v. Collingsworth, et al.* currently pending in the Northern District of Alabama before Judge R. David Proctor. On stipulation of the parties, Judge Jack B. Weinstein previously entered an order (Doc. 4) setting a briefing schedule whereby Plaintiff's opposition would be due September 18, 2013, and Defendants' reply would be due October 2, 2013. Defendants have recently been ordered by Judge Proctor in the Alabama proceeding to provide a privilege log, which will now be due October 2. Also, the parties expect that Judge Proctor will hold oral argument on a pending motion to compel during the first two weeks of October which will address many of the legal arguments at issue in this miscellaneous proceeding. The parties believe that both the privilege log and the hearing before Judge Proctor may be beneficial for this Court's analysis of the matter.

BAILEY DUQUETTE P.C.

Sincerely,



James D. Bailey
(917) 797-5948
james@baileyduquette.com

cc (via ECF): Thomas M. Mullaney
Law Offices of Thomas M. Mullaney
489 Fifth Avenue
Ste. 1900
New York, NY 10017
212-223-0800
Fax: 212-661-9860
Email: tmm@mullaw.org

Attorney for Defendants